

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:
LOCAL TV ADVERTISING ANTITRUST
LITIGATION

This Document Relates to All Actions

MDL No. 2867
No. 18 C 6785

Honorable Virginia M. Kendall

ORAL ARGUMENT REQUESTED

**PLAINTIFFS' FIRST MOTION FOR LEAVE
TO AMEND THE OPERATIVE COMPLAINT**

Plaintiffs Thoughtworx, Inc. d/b/a MCM Services Group, and One Source Heating & Cooling, LLC (collectively, “Plaintiffs”) respectfully move the Court to amend the operative complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. In support of this motion, Plaintiffs hereby adopt and expressly incorporate their contemporaneously filed Memorandum in Support of Plaintiffs’ First Motion for Leave to Amend the Operative Complaint.

Dated: August 7, 2019

Respectfully submitted,

By: /s/ Megan E. Jones

Megan E. Jones*

HAUSFELD LLP

600 Montgomery St. #3200
San Francisco, CA 94111

Tel: (415) 633-1908

Fax: (415) 358-4980

mjones@hausfeld.com

Michael D. Hausfeld*

Hilary K. Scherrer*

Melinda R. Coolidge*

HAUSFELD LLP

1700 K Street NW #650
Washington, DC 20006

Tel: (202) 540-7200
Fax: (202) 540-7201
mhausfeld@hausfeld.com
hscherrer@hausfeld.com

Gary I. Smith, Jr.*
Tamara R. Freilich*
HAUSFELD LLP
325 Chestnut Street, Suite 900
Philadelphia, PA 19106
Tel: (215) 985-3270
Fax: (215) 985-3271
gsmith@hausfeld.com
tfreilich@hausfeld.com

Lead Counsel

Hollis Salzman
Meegan Hollywood*
ROBINS KAPLAN LLP
399 Park Avenue, Suite 3600
New York, NY 10022
Tel: (212) 980-740
Fax: (212) 980-7499
[hosalzman@robinskaplan.com](mailto:hsalzman@robinskaplan.com)
mhollywood@robinskaplan.com

Kimberly A. Justice
FREED KANNER LONDON & MILLEN LLC
923 Fayette Street
Conshohocken, PA 19428
Tel: (610) 234-6487
Fax: (224) 632-4521
kjustice@fkmlaw.com

Plaintiffs' Steering Committee

Robert J. Wozniak
Steven A. Kanner
Michael J. Freed
FREED KANNER LONDON & MILLEN LLC
2201 Waukegan Road, Suite 130
Bannockburn, IL 60015
Tel: (224) 632-4500
skanner@fkmlaw.com
mfreed@fkmlaw.com

rwozniak@fkmlnlaw.com

Liaison Counsel

Stephanie A. Scharf
SCHARF BANKS MARMOR LLC
333 West Wacker Drive, Suite 450
Chicago, IL 60606
Tel: (312) 726-6000
sscharf@scharfbanks.com

Additional Counsel for Plaintiffs and the Proposed Class

*Admitted *Pro Hac Vice*.

CERTIFICATE OF SERVICE

I, Megan E. Jones, certify that on August 7, 2019, I caused the foregoing Plaintiffs' First Motion for Leave to Amend the Operative Complaint and the memorandum of law in support thereof and its exhibit, to be filed with the Clerk of the Court through the CM/ECF system, which will automatically send electronic notifications of the filing to all counsel of record.

/s/ Megan E. Jones